



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2018 Grand Jury

UNITED STATES OF AMERICA,

CR No. 18-  
**CR 18-00876**

Plaintiff,

I N D I C T M E N T

v.

[18 U.S.C. § 1014: False Statement  
to a Financial Institution;  
18 U.S.C. § 1029(a)(2): Use of an  
Unauthorized Access Device;  
18 U.S.C. § 1028A(a)(1):  
Aggravated Identity Theft]

ANDERSON SAM BONILLA ECHEGOYEN,  
aka "Anderson Samuel  
Bonilla,"  
aka "Anderson Sam Echegoyen,"  
aka "Anderson Sam  
Bonilla-Echegoyen,"

Defendant.

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 1014]

On or about June 26, 2018, in Los Angeles County, within the  
Central District of California, and elsewhere, defendant ANDERSON SAM  
BONILLA ECHEGOYEN, also known as ("aka") "Anderson Samuel Bonilla,"  
aka "Anderson Sam Echegoyen," aka "Anderson Sam Bonilla-Echegoyen"  
("BONILLA ECHEGOYEN"), knowingly made false statements and reports to  
Synchrony Bank ("Synchrony"), an institution the accounts of which

1 were insured by the Federal Deposit Insurance Corporation, for the  
2 purpose of influencing the actions of Synchrony, in connection with  
3 an application to obtain a line of credit from CareCredit, which was  
4 administered by Synchrony. Specifically, in an online application  
5 for a line of credit from CareCredit to pay for dental work,  
6 defendant BONILLA ECHEGOYEN falsely represented that his name was  
7 "C.M.," that his date of birth was XX-XX-1977, and that his social  
8 security number was XXX-XX-9544 when, in truth and in fact, as  
9 defendant BONILLA ECHEGOYEN then well knew, his name was not "C.M.,"  
10 his date of birth was not XX-XX-1977, and his social security number  
11 was not XXX-XX-9544.

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1 COUNT TWO

2 [18 U.S.C. § 1029(a)(2)]

3 On or about June 26, 2018, in Los Angeles County, within the  
4 Central District of California, and elsewhere, defendant ANDERSON SAM  
5 BONILLA ECHEGOYEN, also known as ("aka") "Anderson Samuel Bonilla,"  
6 aka "Anderson Sam Echegoyen," aka "Anderson Sam Bonilla-Echegoyen,"  
7 knowingly and with intent to defraud, used an unauthorized access  
8 device, as defined in Title 18, United States Code, Sections  
9 1029(e)(1) and (3), namely, a social security number belonging to  
10 C.M., and by such conduct obtained things of value aggregating at  
11 least \$1,000 during a one-year period, with said use affecting  
12 interstate and foreign commerce.

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1 COUNT THREE

2 [18 U.S.C. § 1028A(a)(1)]

3 On or about June 26, 2018, in Los Angeles County, within the  
4 Central District of California, and elsewhere, defendant ANDERSON SAM  
5 BONILLA ECHEGOYEN, also known as ("aka") "Anderson Samuel Bonilla,"  
6 aka "Anderson Sam Echegoyen," aka "Anderson Sam Bonilla-Echegoyen"  
7 ("BONILLA ECHEGOYEN"), knowingly possessed and used, without lawful  
8 authority, means of identification that defendant BONILLA ECHEGOYEN  
9 knew belonged to another person, namely, the name, date of birth, and  
10 social security number of C.M., during and in relation to the offense  
11 of Use of an Unauthorized Access Device, a felony violation of Title  
12 18, United States Code, Section 1029(a)(2), as charged in Count Two  
13 of this Indictment.

14 A TRUE BILL

15  
16 151  
17 Foreperson

18 NICOLA T. HANNA  
19 United States Attorney

20 LAWRENCE S. MIDDLETON  
21 Assistant United States Attorney  
Chief, Criminal Division

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23 SCOTT M. GARRINGER  
24 Assistant United States Attorney  
Deputy Chief, Criminal Division

25 CHRISTINA T. SHAY  
26 Assistant United States Attorney  
Deputy Chief, General Crimes Section

27 BENEDETTO L. BALDING  
28 Assistant United States Attorney  
General Crimes Section